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June 7, 2024

By ECF

Hon. Arun Subramanian
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Joseph Sprolling*,
24 Cr. 147 (AS)

Dear Judge Subramanian:

I represent Joseph Sprolling and write on his behalf to request [authorization for him to accept an offer of employment that will require work from 10:00 p.m. to 6:00 a.m.](#)

Mr. Sprolling is on pretrial release subject to location monitoring and curfew, to be set at the discretion of Pretrial Services. He is compliant with all conditions of release. I consulted with assigned Pretrial Services Officer Marlon Ovaes who informs that Pretrial objects to overnight employment for defendants subject to location monitoring as a matter of policy, but that he has no specific objection to Mr. Sprolling accepting this offer of employment. He confirms that Mr. Sprolling is compliant with all conditions of supervision. Government counsel defers to the position of Pretrial Services.

Obtaining employment is one of the conditions of pre-trial release in this case. Mr. Sprolling has worked tirelessly towards that goal but has been, to this point, unsuccessful. He has attended over 100 hundred hours of classes at the NJ Reentry Corporation and applied for dozens of jobs. *See* NJ Reentry Corporation Certificates, Exh. A. The proposed employment is for a company that provides maintenance and cleaning services for private aircraft at Teterboro Airport, which is located near Mr. Sprolling's residence in New Jersey (approximately 15 minutes by car). Email correspondence with the proposed employer is attached. *See* Exh. B, Offer of Employment.

Thank you for your consideration of this application.

Respectfully yours,



Evan L. Lipton
Attorney for Joseph Sprolling

SO ORDERED. The Clerk of Court is directed to terminate the motion at Dkt. 20.



Arun Subramanian, U.S.D.J.
Date: June 7, 2024